

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

THE UNITED STATES OF AMERICA, ex rel.)
STEPHEN BACHERT)
)
Plaintiff,)
)
v.) Civil Action No. 1:16-cv-456
) (TSE/JFA)
)
TRIPLE CANOPY, Inc.)
)
Defendant.)
)

PLAINTIFF’S OBJECTIONS TO DEFENDANT’S TRIAL WITNESS LIST

Plaintiff Stephen Bachert, through undersigned counsel, hereby respectfully submits the following list of objections to Defendant Triple Canopy, Inc.'s Rule 26(a)(3) Exhibit List:

OBJECTIONS

These objections reflect the present status of the above-captioned matter. As such, by not objecting to certain exhibits on grounds of relevance, Plaintiff does not waive any such objection in the event that any exhibit becomes irrelevant because of this Court's ruling on any pre-trial motions nor does Plaintiff waive any objection based on the use of any exhibit because of developments at trial.

Several of these objections are objections only to the introduction and admission of the exhibit as affirmative evidence, and as such, Plaintiff reserves the right to use any exhibit, whether listed or not, as impeachment or rebuttal exhibits, if necessary.

Plaintiff reserves the right to waive any of these objections, to interpose objections based on authenticity, foundation, and, depending on usage, hearsay, and to add to these objections based on any ruling this Court might enter. Plaintiff also reserves the right to amend these

objections should further developments warrant (including, but not limited to, if Defendant submits a revised exhibit list).

Plaintiff objects to Defendant's calling of a Corporate Representative at trial as inadmissible hearsay and based on a lack of personal knowledge.

Dated: August 6, 2018

RESPECTFULLY SUBMITTED,

By: /s/ Jack Jarrett
Jack Jarrett (VSB #86176))
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CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2018 I filed the foregoing with the Court's CM/ECF system, which will automatically serve a copy on:

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Respectfully Submitted,

/s/

Jack Jarrett (VSB #86176)

Jack Jarrett